

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: WAVE 8 CASES ON ATTACHED EXHIBIT "A"	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF PETER SAND, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Peter Sand, M.D., from giving opinions on: (1) the design and material properties of the TVT Retropubic mesh device; and (2) the safety and efficacy of the TVT Retropubic device.

In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:

1. A true copy of the Wave 8 TVT Expert Report of Peter Sand, M.D., attached as Exhibit B.
2. A true copy of the Deposition of Peter Sand, M.D. dated September 26, 2018, attached as Exhibit C.
3. A true copy of the Curriculum Vitae of Peter Sand, M.D., attached as Exhibit D.

Dated: October 18, 2018

Respectfully submitted,

/s/ Jeffrey M. Kuntz

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on October 18, 2018 using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Jeffrey M. Kuntz
Attorney for Plaintiffs